

Hon. Paul A. Engelmayer
United States District Court
for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

November 18, 2024

Re: Jane Street Grp., LLC v. Millennium Mgmt. LLC at al., No. 1:24-cv-02783

Dear Judge Engelmayer:

We write on behalf of Defendants Douglas Schadewald, Daniel Spottiswood, and Millennium Management, LLC. Pursuant to Local Civil Rule 7.1.(d) and Individual Practice Rule 4.B, we seek permission to provisionally file under seal Defendants' letter opposition ("Letter Opposition") to Jane Street's motion for a protective order, Dkt. 232, and the exhibits to the Declaration of Rollo C. Baker in Support of the Letter Opposition ("Exhibits").

The Letter Opposition and Exhibits discuss areas of discovery related to Jane Street's businesses. Exhibits 1–3 and 7–11 consist of documents that Jane Street produced that have been designated either Confidential or Highly Confidential – Attorney's Eyes Only. Exhibits 4, 6, and 12 consist of formal discovery requests and responses and objections thereto and have been designated Confidential. Exhibit 5 consists of a deposition transcript designated Highly Confidential – Attorney's And Individual Defendants' Eyes Only. Exhibit 13 consists of correspondence between the parties concerning a host of discovery issues.

The Letter Opposition cites to, paraphrases, or quotes from each of the Exhibits. Because Defendants believe that Jane Street will seek to seal portions of the Letter Opposition and some or all of the Exhibits, Defendants request leave to provisionally file the Letter Opposition and the Exhibits under seal. Defendants will meet and confer with Jane Street regarding sealing or redactions of the Letter Opposition and Exhibits, and to the extent Jane Street consents, file public redacted versions by close of business on November 21, 2024. Defendants reserve the right to challenge any redactions proposed by Jane Street.

Respectfully submitted,

/s/ Rollo Baker
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